

Exhibit II

Declaration of Michael Lansky

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

State of Arizona, ex rel. Kristin K. Mayes)	
Attorney General et al.)	
)	
Plaintiffs)	
)	
v.)	Case No. 4:23-cv-00233-EJM
)	
Michael D. Lansky, LLC, dba)	
Avid Telecom, an Arizona)	
Limited Liability Company;)	
)	
Michel D. Lansky, individually)	
As a Member/Manager/Chief)	
Executive Officer of Michael D.)	
Lansky, LLC dba Avid Telecom;)	
and)	
)	
Stacey S. Reeves, individually as)	
a Manager/Vice President of)	
Michael D. Lansky LLC dba)	
Avid Telecom)	
)	
Defendants.)	

Declaration of Michael Lansky

I. Qualifications

I have served as the CEO and the day-to-day person in charge of all Avid Telecom operations since 1997. In that capacity, I have decades of experience in all aspects of the telecommunications business, including networking and technology issues, regulatory compliance, and robocall mitigation, including direct involvement in creating compliance protocols. Prior to the forced closure of Avid Telecom in 2023, I was widely viewed in

the industry as an expert in these issues and for my leadership in efforts to mitigate and to prevent illegal robocalling.

As the CEO of Avid Telecom, I have directly observed every aspect of company operations, including each of the issues associated with the complaint and the issues set forth in the Rudolph Expert Testimony. I believe that I am fully qualified and capable of offering relevant factual testimony and expert opinions on all material issues in the case that are essential to the trier of fact. Indeed, unlike much of the facts alleged in the Rudolph Expert Report, all of the fact evidence provided in my hybrid testimony is based on my personal observation, knowledge, and expertise.

II. Scope of Work

I am providing hybrid fact and expert testimony, affirmatively to present facts in support of Defendants' defenses in the captioned proceeding, and as an expert witness in response to the Rudolph Expert Report. The hybrid testimony that I am presenting clearly delineates between my allegations of fact and my expert opinions. The bases for my opinions are presented in accordance with Federal Rule of Civil Procedure 26(a)(2)(C). I am not being compensated for providing this testimony.

Dated: October 29, 2025

A handwritten signature in black ink, appearing to read "Michael D. Lansky", written over a horizontal line.

Michael D. Lansky